

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

IN RE:)
SCOTT DALE GREGORY) Case No. BK-12-14830-JDL
) Chapter: 13
DEBTOR(s))

**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS
FOR FAILURE TO MAKE REGULAR PAYMENTS AND BRIEF IN SUPPORT**

COMES NOW the Debtor, by and through his attorney of record, Jeffrey E. West, in the above captioned case and in response to the Trustee's Motion to Dismiss, and in support thereof alleges and states as follows:

1. That the debtor filed his Voluntary Petition for Relief under Chapter 13 under the United States Bankruptcy Code on September 28, 2012. An Order confirming plan was entered on December 27, 2012.
2. That the Debtor has had a severe loss of income due to being hurt on the job. The debtor is attempting to pay his delinquent amount with his worker's compensation until released from medical care. However, if the Debtor is unsuccessful, he desires to file a Motion to Modify to allow him to continue in his Chapter 13 plan.

WHEREFORE, Debtor respectfully requests that your Honorable Court deny the Motion to Dismiss filed by the Trustee, allow the Debtor to file a Motion to Modify and if needed set this matter for hearing and order such other and further relief as is just and proper.

Dated: June 29, 2015.

Respectfully submitted,

/s/ Jeffrey E. West
JEFFREY E. WEST, OBA #18871
210 SE 89th St.
OKC, OK 73149
(405) 616-4949
(405) 721-9503 Fax
lawwestj@yahoo.com

CERTIFICATE OF MAILING

I certify that on the 29th day of June 2015, a true and correct copy of the above Response was electronically served using the CM/ECF system, namely: John Hardeman, Chapter 13 Trustee. Further, I certify that on the 29th day of June 2015 copies of the Response were forwarded via U.S. Mail, first class, postage prepaid and properly addressed to the following at the addresses shown below:

See Attached Matrix

/s/ Jeffrey E. West
JEFFREY E. WEST

AFNI, INC
PO BOX 3517
BLOOMINGTON IL 61702-3517

ALLY FINANCIAL
200 RENAISSANCE CTR
DETROIT MI 48243

CITIBANK USA
CITICORP CREDIT
SERVICES/ATTN: CENTRALIZ
PO BOX 20363
KANSAS CITY MO 64195

CITIMORTGAGE INC
PO BOX 9438,DEPT 0251
GAITHERSBURG MD 20898

CMRE FINANCIAL SERVICES
INC
3075 E IMPERIAL HWY
SUITE 200
BREA CA 92821

ENHANCED RECOVERY CORP
ATTENTION: CLIENT
SERVICES
8014 BAYBERRY RD
JACKSONVILLE FL 32256

GEMB/CARE CREDIT
ATTN: BANKRUPTCY
PO BOX 103104
ROSWELL GA 30076

LOVE BEAL & NIXON
PO BOX 32738
OKLAHOMA CITY OK 73123-
0938

MIDLAND FUNDING
8875 AERO DR STE 200
SAN DIEGO CA 92123

PROGRESSIVE MANAGEME
PO BOX 2220
WEST COVINA CA 91793

TATE & KIRLIN ASSOCIATES
2810 SOUTHAMPTON ROAD
PHILADELPHIA PA 19154-1207

VANDERBILT MORTGAGE
ATTN: BANKRUPTCY DEPT
P.O. BOX 9800
MARYVILLE TN 37802